

Exhibit F

DECLARATION

STATE OF TEXAS

COUNTY OF BEXAR

My name is OLIVER W. HILL and I am competent to provide this statement. The facts stated in this affidavit are within my personal knowledge and are true and correct.

1. My name is Oliver W. Hill and I am fourth generation native of San Antonio, Bexar County, Texas and with the NAACP in the State of Texas and also hold the position of Branch President in San Antonio. The Texas State Conference of NAACP Branches is a plaintiff in the Voter ID litigation.
2. The Texas State Conference of NAACP Branches is a nonprofit organization affiliated with a parent organization which has its home office in Baltimore, Maryland. Our mission includes eliminating unwarranted color distinctions in our law and society.
3. To promote civic engagement, the NAACP in many parts of our state engages in Get Out the Vote Efforts, and at the State Level we also assist in protecting voters who may be the subject of intimidation or other voter suppression tactics.
4. Despite this being 2016 and there being an African-American President of the United States, voters in San Antonio and in Texas continue to suffer from efforts to intimidate our community from voting.
5. The Texas State Conference of NAACP Branches and many of its units plan to undertake efforts to educate voters and assist them in understanding the new remedy that was put in place by Judge Ramos.
6. I have seen the statements made by the Texas Attorney General and Harris County Clerk and Election Official Stan Stanart and they cause me great concern. The comments appear clearly to be intended to frighten and dissuade individuals from availing themselves of the new remedy from my observation.
7. The comments are so broad they may indeed have the effect of impacting voters who were not intending to vote pursuant to the interim order but instead under other normal procedures. This is why I say that: The comments made by the Texas Attorney General and the Harris County Clerk and Election Official have a chilling effect to threaten and intimidate African Americans and all people of color. Suggesting that a comment that anyone who executes an affidavit will be subject to

investigation for possible prosecution is somehow not intimidating is simply mind-boggling to me.

8. These comments have negatively impacted us in our community and have complicated our ability to participate in the electoral process by our voter registration and voter privileges as stated in our Constitution.
9. These events are mindful of history in our community such as the "Jim Crow" days when a Poll Tax was purchased to obtain the privilege of voting or in some parts of the country; Literacy Tests were given to African Americans and other minorities to prevent them from exercising their Constitutional rights.
10. Threats of criminal prosecution of voters, like the statements already made, effectively discourage minority voters from voting. Election procedures are already complicated. In addition to frightening would-be-voters, these statements increase voter confusion.

I, Oliver W. Hill, declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on September 7, 2016.



Oliver W. Hill